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November 12, 2020

Hon. Lorna G. Schofield
United States District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Navar et al v. Walsh Construction Company II, LLC et al.*
Court File No. 1:18-cv-10476 LGS

Dear Judge Schofield:

This firm represents Walsh Construction Company II, LLC ("Walsh") in the action referenced above. In accordance with Rule I.C.3 of the Court's Individual Rules and Procedures for Civil Cases, we write jointly with counsel for Skanska USA Civil Northeast Inc. and Skanska USA Building Inc. (the "Skanska Defendants"), concerning redactions in materials to be filed in connection with Defendants' Motion to Strike Opt-In Plaintiffs. Defendants propose these redactions in order to protect sensitive non-public information, including information related to the compensation and other benefits purported Opt-In Plaintiffs have received as a result of entering into severance agreements with Defendants.

Filed contemporaneously with this letter are Declarations with the relevant attached exhibits containing the proposed redactions in highlighted form. The redactions are as follows:

- Mark Konkel Declaration, Exhibit E: Walsh requests a redaction in Jill Bramwell's severance agreement due to the inclusion of non-public and sensitive business information.
- Benjamin Sandahl Declaration, Exhibit G: The Skanska Defendants request a redaction in Samantha Little's severance agreement due to the inclusion of non-public and sensitive business information.

Thank you for your consideration of this request.

Respectfully,

/s/ Nidhi Srivastava

Nidhi Srivastava

CC: All Attorneys of Record